



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 29, 2025

VIA ECF

Hon. Arun Subramanian
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Lera v. Noem, et al.*, No. 25 Civ. 2795 (AS)

Dear Judge Subramanian:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an application for an immigration benefit—specifically, Form I-589, Application for Asylum and for Withholding of Removal. *See* Complaint ¶ 1, ECF No. 1. With the plaintiff’s consent, I write respectfully to request a sixty-day extension of pending dates in this action. During this sixty-day period, USCIS expects to schedule and conduct an interview of plaintiff, a necessary step for adjudicating the application; once those steps are complete, the agency will work toward adjudicating the application. The agency is currently working to schedule the interview.

We therefore respectfully request a 60-day adjournment of: (1) the initial pretrial conference, which is currently set for May 8, 2025, at 3:30 pm; (2) the related pre-conference submission currently due tomorrow under the Court’s scheduling order, ECF No. 5; and (3) the government’s time to answer or otherwise respond to the complaint, which is currently June 9, 2025.

I thank the Court for its consideration of this request.

GRANTED. The initial pretrial conference is hereby rescheduled to Tuesday, July 8, 2025, at 3:30 PM. The dial-in information remains the same. The related pre-conference submission is due July 2, 2025. The government’s time to answer or otherwise respond to the complaint is extended to August 9, 2025. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 6.

SO ORDERED.

Arun Subramanian, U.S.D.J.
Date: April 30, 2025

Respectfully submitted,

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